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Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DONNA L. GRAY

Plaintiff,

v.

NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,

Defendant.

Case No. 2:17-cv-02307-JAD-NJK

**JOINT STIPULATION AND ~~PROPOSED~~  
ORDER FOR EXTENSION OF TIME TO  
RESPOND TO PLAINTIFF'S MOTION FOR  
REVERSAL OR REMAND**

**(FIRST REQUEST)**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Summary Judgment be extended from February 26, 2018 to **March 26, 2018**. This is Defendant's first request for extension. Good cause exists to grant Defendant's request for extension. Counsel has three pending Ninth Circuit matters, which require multiple levels of review due on the date of the current filing deadline, March 5, 2018 and March 12, 2018, respectively. In addition, Counsel has over 65+ pending social security cases, which require two or more dispositive motions a week until late April. Counsel also has two pending civil rights matters which require imminent attention and investigation. Counsel also became behind on her heavy

caseload to prepare for a Ninth Circuit oral argument in Pasadena, California on February 15, 2018. Due to current workload demands and shortened staff, Counsel needs additional time to adequately review the transcript and properly respond to Plaintiff's Motion for Summary Judgment. Defendant makes this request in good faith with no intention to unduly delay the proceedings. The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

Respectfully submitted,

Dated: February 26, 2018

/s/ \*Cyrus Safa  
(\*as authorized by email on February 26, 2018)  
CYRUS SAFA  
Attorney for Plaintiff

Dated: February 26, 2018

DAYLE ELIESON  
United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration

By /s/ Tina L. Naicker  
TINA L. NAICKER  
Special Assistant U.S. Attorney  
Attorneys for Defendant

**ORDER**

APPROVED AND SO ORDERED:

DATED: February 26, 2018

  
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HON. NANCY J. KOPPE  
UNITED STATES MAGISTRATE JUDGE